



**HOME BUILDERS & REMODELERS ASSOCIATION
OF CONNECTICUT, INC.**

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*Your Home
Is Our
Business*

March 10, 2014

To: Senator Anthony J. Musto, Co-Chairman
Representative Ed Jutila, Co-Chairman
Members of the Government Administration & Elections Committee

From: Bill Ethier, CAE, Chief Executive Officer

Re: **Raised Bill 349, AAC Regulations of Significant Impact**

The HBRA of Connecticut is a professional trade association with about nine hundred (900) member firms statewide employing tens of thousands of CT's citizens. Our members, all small businesses, are residential and commercial builders, land developers, remodelers, general contractors, subcontractors, suppliers and those businesses and professionals that provide services to our diverse industry and to consumers. Our members build between 70% and 80% of all new homes and apartments in the state each year and perform countless home improvements.

The HBRA of Connecticut strongly supports SB 349. Our members must often obtain a variety of state agency permits in order to pursue housing developments. Depending on the particular community that is to be built, our members need permits or other regulatory approvals from DEEP (variety of environmental permits), DPH (water and sewage treatment), DOT (STC approvals), DECD (state housing assistance), DAS (building and fire codes) and OPM (state plan of conservation and development, Incentive Housing program). Our businesses are also regulated by DCP (contractor licenses and registration programs) and, of course, DRS (taxes).

Industry members, and our association, often deal with and participate in state agency rulemaking. SB 349 creates reasonable new requirements on state agencies. **Articulating policy goals proposed regulations are intended to advance is common sense. Instructing agencies to think more about impacts** its regulations may have on businesses and our economic and job growth is common sense. And, it is logical to include in the definition of regulations that are "reasonably likely to have a significant impact" those regulations that impact small businesses, where much of our job growth occurs, as well as larger businesses and the cost implications to both state and municipal governments, which in turn would translate to tax burdens on businesses and citizens. **Like last year's regulatory accountability law, PA 13-279, this one should have been done long ago.**

SB 349 could be improved by adding to the bill general permit programs utilized by state agencies. General permits are not considered regulations by state agencies and escape the normal processes of chapter 54 (UAPA)(unless a petition challenges the permit's issuance) and consideration by the Regulations Review Committee. But, many such general permits have broad applicability and impose highly significant requirements on businesses. These general permits would also escape the requirements of SB 349, but they should not.

We urge you to support SB 349 and help further improve the regulatory environment in Connecticut. Thank you for the opportunity to comment on this important legislation.

**Building CT's Economy, Communities and Better Lives with Advocacy and Knowledge
that Solves Our Members' Problems**